

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------|---|-------------------------|
| SANDRA KERNAGHAN, |) | |
| |) | 08 C 102 |
| Plaintiff, |) | |
| v. |) | Honorable Judge ST. EVE |
| |) | |
| CITY OF CHICAGO, et al., |) | Magistrate Judge NOLAN |
| |) | |
| Defendants. |) | Jury Demand |

**DEFENDANT OFFICERS' AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED
COMPLAINT**

Defendant Chicago Police Officers Matthew Cline, Jose Cardo, Daniel DeLopez, John Dolan, Craig Dunderdale, Vernon Mitchell Jr., Kenneth Urbon, and Scott Wolff ("Defendant Officers"), by one of their attorneys, Anne K. Preston, Assistant Corporation Counsel, respectfully request that this Honorable Court extend the time, up to and including June 20, 2008, to answer or otherwise plead to Plaintiff's First Amended Complaint. In support of this motion, Defendant Officers state as follows:

1. Plaintiff filed her First Amended Complaint on April 15, 2008. The Summons and Complaint were served upon the individual Defendant Officers between May 5, 2008 and May 13, 2008.
2. The undersigned filed an appearance for the Defendant Officers Cline and Mitchell on May 11, 2008 and for Defendant Officers Cardo, De Lopez, Dolan, Dunderdale, Urbon, and Wolff on May 29, 2008.

3. Defendant Officers' Answer or other responsive pleadings are due on or about May 27, 2008.
4. Defendant Officers' attorney has not been able to review materials pertinent to the allegations in this case.
5. This motion is Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues.
6. Plaintiff's counsel has no objection to Defendant Officers' request for an extension of time.

WHEREFORE, Defendants, Matthew Cline, Jose Cardo, Daniel DeLopez, John Dolan, Craig Dunderdale, Vernon Mitchell Jr., Kenneth Urbon, and Scott Wolff, respectfully request that this Honorable Court grant an extension, up to and including, June 20, 2008 to answer or otherwise plead to Plaintiff's First Amended Complaint.

Respectfully submitted,

BY: /s/ Anne K. Preston
ANNE K. PRESTON
Assistant Corporation Counsel

30 North La Salle Street
Suite 1400
Chicago, Illinois 60602
(312) 742-4045
Atty. No. 6287125

CERTIFICATE OF SERVICE

I, Anne K. Preston, hereby certify that I have caused a true and correct copy of the above and foregoing **NOTICE OF MOTION** and **DEFENDANT OFFICERS' AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT**, to be sent via e-filing to the persons named in the foregoing Notice, "Filing Users" pursuant to Case Management/Electronic Case Files, on May 29, 2008, in accordance with the rules on electronic filing of documents.

/s/ Anne K. Preston
ANNE K. PRESTON
Assistant Corporation Counsel